

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

EDWARD A. WILLIAMS,

Plaintiff,

v.

Civil Action No. 17-CV-2641

MERRICK B. GARLAND et al.,

Defendants.²

DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE EXCESS PAGES

Defendants respectfully request leave to file a reply in support of Defendants' Second Renewed Motion for Summary Judgment no longer than thirteen (13) pages in length. Good cause supports this motion. First, this case presents a significant legal question—namely, the constitutionality of an important federal statute as applied to Plaintiff. Second, Plaintiff's response in opposition to Defendants' Second Renewed Motion for Summary Judgment is twenty-three (23) pages in length—indeed, slightly longer than Plaintiff's opening brief in support of Plaintiff's Fourth Motion for Summary Judgment, which totals twenty-one (21) pages in length. In light of these circumstances, to adequately address the arguments in Plaintiff's response brief, Defendants require an additional three pages beyond the default page limit applicable to replies pursuant to this Court's Policies and Procedures.

Dated: November 13, 2023

Respectfully submitted,

BRIAN M. BOYNTON

² Hon. Merrick B. Garland, Steven M. Dettelbach, and Christopher Wray are automatically substituted as Defendants in this action pursuant to Rule 25(d) of the Federal Rules of Civil Procedure. *See* ECF No. 55 at 1 n.1.

Principal Deputy Assistant Attorney General

LESLEY FARBY
Assistant Branch Director

/s/ Taisa M. Goodnature
TAISA M. GOODNATURE
New York Bar No. 5859137
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, N.W.
Washington, D.C. 20005
Telephone: (202) 514-3786
Fax: (202) 616-8470
Email: Taisa.M.Goodnature@usdoj.gov

Counsel for Defendants

CERTIFICATE OF CONFERENCE

On November 13, 2023, I conferred with Mr. Joshua Prince, who represented that Plaintiff does not oppose this motion.

/s/ Taisa M. Goodnature
TAISA M. GOODNATURE

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Unopposed Motion for Leave to File Excess Pages was filed through the CM/ECF system, which will provide electronic notice to the following counsel:

Adam J. Kraut (akraut@civilrightsdefensefirm.com)
Joshua Prince (Joshua@PrinceLaw.com)

/s/ Taisa M. Goodnature
TAISA M. GOODNATURE